

**EXHIBIT D**

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1 CHRISTOPHER J. HICKS  
Washoe County District Attorney  
2 HERBERT B. KAPLAN  
Deputy District Attorney  
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6 ATTORNEYS FOR DEANNA SPIKULA,  
WASHOE COUNTY REGISTRAR OF VOTERS  
7

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 \* \* \*

11 STANLEY WILLIAM PAHER, TERRESA  
MONROE-HAMILTON, AND GARRY  
12 HAMILTON, DARYL BYRON DESHAW,  
JEFF ECKER, GARY GLADWILL, LINDA  
13 BARNETT, and NEVADA RIGHT TO LIFE,

14 Plaintiffs,

15 vs.

16 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State,  
17 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
18 JOSEPH P. GLORIA, in his official capacity  
as Registrar of Voters for Clark County,  
19

20 Defendants.

21 and

22 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
CORPORATION/DEMOCRATIC  
23 NATIONAL COMMITTEE, DCCC,  
PRIORITIES USA, and JOHN SOLOMON,  
24

25 Intervenor-Defendants.  
26

Case No. 3:20-cv-00243- MMD-WGC

**DECLARATION OF HERBERT B.  
KAPLAN**

1 I, HERBERT B. KAPLAN, under penalty of perjury, hereby declare as follows:

2 1. I am over eighteen years of age. I have personal knowledge of the facts set forth  
3 herein. I am a Washoe County Deputy District Attorney. I am admitted to practice law in  
4 Nevada. I am an attorney for Defendant, Washoe County Registrar of Voters, Deanna Spikula. I  
5 submit this declaration to provide the Court true and correct copies of certain documents  
6 submitted in connection with Ms. Spikula's Opposition to Second Motion for Preliminary  
7 Injunction.

8 2. Exhibit A to the Opposition is a true and correct copy of the Declaration of Wayne  
9 Thorley filed in Corona v. Cegavske, First Judicial District Court of Nevada, Case No. 20-OC-  
10 00064 1B.

11 3. Exhibit B to the Opposition is a true and correct copy of the Declaration of Deanna  
12 Spikula dated May 18, 2020.

13 4. Exhibit C to the Opposition is a true and correct copy of the article "Make sure you  
14 sign your ballot in correct spot and other tips to vote in Nevada's primary," that appeared in the  
15 Las Vegas Sun on May 17, 2020, as it appeared online at  
16 <https://lasvegassun.com/news/2020/may/17/make-sure-sign-ballot-correct-spot-voting-tips/>.

17 Dated this 20<sup>th</sup> day of May, 2020.

18 CHRISTOPHER J. HICKS  
19 District Attorney

20 By /s/ Herbert B. Kaplan  
21 HERBERT B. KAPLAN  
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